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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA – LAS VEGAS DIVISION**

JERRI L. RAEL,  
Plaintiff,  
vs.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,  
Defendant.

CIVIL NO. 2:17-cv-00947-GMN-VCF  
**DEFENDANT’S UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME (FIRST REQUEST)**

IT IS HEREBY STIPULATED, by and between Jerri L. Rael (Plaintiff) and Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of forty-five (45) days to deliver her Motion for Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment. The current due date is November 20, 2017. The new due date will be January 4, 2018. The parties further stipulate that all other dates will be extended accordingly, and Plaintiff’s reply will be due to Defendant by January 24, 2018.

This is the first extension of time requested by Defendant in the above-captioned matter. Defendant requests this extension because the attorney responsible for briefing this case was only recently assigned this case, has an unusually heavy workload this month, and is taking some leave time during the upcoming holidays. This request is made in good faith with no intention to unduly delay the

1 proceedings. Counsel for Defendant conferred with Plaintiff's counsel, Mark Barrett, who has no  
2 opposition to this motion, on November 16, 2017. It is therefore respectfully requested that Defendant  
3 be granted a forty-five (45) day extension of time to respond to Plaintiff's motion, up to and including  
4 January 4, 2018.  
5

6 Respectfully submitted,

7 Dated: November 16, 2017

8 By: /s/ Mark D. Barrett \*  
9 MARK D. BARRETT  
10 (\*by email authorization on 11/16/17)

11 Dated: November 16, 2017

12 STEVEN W. MYHRE  
13 Acting United States Attorney

14 By: /s/ Gina Tomaselli  
15 GINA TOMASELLI  
16 Special Assistant United States Attorney

17 Attorneys for Defendant

18 IT IS SO ORDERED:

19 

20 THE HONORABLE CAM FERENBACH  
21 UNITED STATES MAGISTRATE JUDGE

22 DATE: 11-20-2017  
23 \_\_\_\_\_  
24  
25  
26  
27  
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1 IT IS HEREBY CERTIFIED THAT:

2 I, Gina Tomaselli, certify that the following individual(s) were served with a copy of the  
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method  
4 of service identified below:  
5

6 **CM/ECF:**

7 Mark D. Barrett  
8 Osterhout Berger Disability Law, LLC  
9 521 Cedar Way, Ste. 200  
10 Oakmont, PA 15139  
11 412-794-8003  
12 Fax: 412-794-8050  
13 Email: [Mark@mydisabilityattorney.com](mailto:Mark@mydisabilityattorney.com)

14 Hal Taylor  
15 223 Marsh Avenue  
16 Reno, NV 89509  
17 Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Dated: November 16, 2017

STEVEN W. MYHRE  
Acting United States Attorney

By: /s/ Gina Tomaselli  
GINA TOMASELLI  
Special Assistant United States Attorney

Attorneys for Defendant